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April 24, 2019

-VIA ELECTRONIC FILING -

Mr. Adam Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Docket No 20180049-EI

Dear Mr. Teitzman:

Enclosed for filing on behalf of Florida Power & Light Company (“FPL”) are the errata sheets for FPL witnesses Eduardo DeVarona (direct) and Ronald R. Reagan (rebuttal).

Please contact me at (561) 691-2512 should you or your Staff have any questions or concerns regarding this filing.

Sincerely,

/s/Kenneth M. Rubin
Kenneth M. Rubin

Enclosures

cc: Parties of record in Docket No. 20180049-EI

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Evaluation of storm restoration costs for Florida
Power & Light Company related to Hurricane Irma

Docket No. 20180049-EI

Filed: April 24, 2019

ERRATA SHEET OF EDUARDO DEVARONA

August 31, 2018 –Direct Testimony

| <u>PAGE #</u> | <u>LINE #</u> | <u>CHANGE</u> |
|----------------------|----------------------|---|
| 14 | 11-13 | Change “EA retained contractors to repair localized solar plant sites and clear debris and lines to help open roads” to “contractors retained by the External Affairs and Economic Development (EA) business unit were retained to perform localized solar site repairs, Manatee Lagoon facility repairs and supplemental EOC staffing, including some minimal clearing of debris to permit the contractors to access the areas impacted by the storm that they were retained to repair.” |

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Evaluation of storm restoration costs for Florida
Power & Light Company related to Hurricane Irma

Docket No. 20180049-EI

Filed: April 24, 2019

ERRATA SHEET OF RONALD R.REAGAN

March 15, 2019 –Rebuttal Testimony

| <u>PAGE #</u> | <u>LINE #</u> | <u>CHANGE</u> |
|----------------------|----------------------|---|
| Page 4 | 13-14 | Delete page 4, lines 13-14 and insert the following in its place: “Exhibits RR-3 and RR-3A are FPL’s written responses to OPC Request for Production of Documents No. 9 (without the confidential supporting documents)” |
| Page 4 | 16 | Delete page 4, line 16, and insert the following in its place: “Exhibits RR-4 and RR-4A are FPL’s responses to OPC Interrogatory No. 162.” |
| Page 27 | 8 | Delete “No” |
| Page 27 | 12 | Add “and amended response” after “response” |
| Page 27 | 14 | Delete “in fact” |
| Page 27 | 14 | Add “and amended response” after “response |
| Page 27 | 15 | Add “original and amended” after “Copies of” |
| Page 27 | 17 | Add “Exhibit RR-4A” after “Exhibit RR-4”; delete “Exhibit “RR-5” and add “Exhibit RR-3 and RR-3A” |

EXHIBIT # **CHANGE**

Exhibit RR-3A Add FPL’s Amended Response to OPC Request for
Production of Documents No. 9

Exhibit RR-4A Add FPL’s Amended Response to OPC Interrogatory
No. 162

**Docket No. 20180049-EI
FPL's Amended Response to OPC
Request for Production of Documents No. 9
Exhibit RR-3A, Page 1 of 1**

**Florida Power & Light Company
Docket No. 20180049-EI
OPC's First Request for Production of Documents
Request No. 9 - Amended
Page 1 of 1**

QUESTION:

Logistics. For the logistic costs incurred, provide the supporting invoices (including all supporting detail provided by the vendor) for invoices over \$50,000, and provide all invoices for P Card charges over \$10,000.

AMENDED RESPONSE:

By agreement of counsel for OPC and FPL, the threshold for documents responsive to OPC's First Request for Production of Documents No. 9 for the logistic costs incurred has been modified from \$50,000 to \$75,000. Because this request asks only for invoices and supporting detail, FPL has not included documents related to accruals. Based upon the agreement noted herein and the explanation related to accruals, please see the confidential documents provided with this response.

In addition to the documents produced with FPL's Response to OPC's First Request for Production No. 9 on July 31, 2018, please see two additional confidential documents which were inadvertently omitted from the voluminous documents produced with FPL's response to OPC's First Request for Production of Documents No. 9.

Florida Power & Light Company
Docket No. 20180049-EI
OPC's Eighth Set of Interrogatories
Interrogatory No. 162 - Amended
Page 1 of 1

QUESTION:

Logistics. Refer to response to POD No. 9. Explain why you failed to produce invoices for numerous costs listed in the excel attachment to your response to POD 9 (i.e. only meal counts were included in the file). To the extent invoices were produced for some costs, explain why the invoice amounts for those costs are different from the amounts included on the excel sheet that lists invoice amounts.

AMENDED RESPONSE:

Contrary to the statement in OPC's Eighth Set of Interrogatories No. 162, all invoices, with the exception of two which were inadvertently omitted from the voluminous documents produced with FPL's response to OPC's Request for Production No. 9 and which have now been provided with FPL's Supplemental Response to OPC's Request for Production No. 9, and other supporting documents for the costs identified in the excel attachment that were above the threshold agreed to by FPL and OPC have been provided at Bates Nos. FPL 000623 – 001394 and Bates Nos. FPL 100225 – FPL 100256.

The primary difference in amounts for some invoices and the amounts reflected on the excel sheet was due to sales tax being assessed. FPL has a Direct Pay Permit from the FL Dept. of Revenue and as such we normally don't pay the sales tax to the vendors. FPL self-accrues and pays any applicable taxes directly to the State.